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United States Department of the Interior

NATIONAL PARK SERVICE

Wrangell-St. Elias National Park / Preserve

P.O. Box 29

Glennallen, Alaska 99588



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January 10, 1989

Memorandum

To: Park Staff

From: Superintendent, Wrangell-St. Elias NP/P

Subject: Subsistence Green Log Policy

The preamble to 36 CFR Part 13 dated June 17, 1981, states the following with regard to the subsistence use of timber and plant materials:

Section 13.49(a) relaxes the general public use regulations by allowing local rural residents in park areas where subsistence uses are allowed to obtain a permit to cut standing live timber of greater than three inches diameter at ground height for subsistence needs such as shelter or fuel. Before issuing a permit, the Superintendent must determine that the proposed cutting is compatible with the purposes for which the park area was established. Furthermore, the Superintendent will include in the permit any stipulations deemed necessary to protect the resources of the park area...

In order to implement this direction, a study of the forest resources in areas subject to timber cutting was initiated in 1986. This study concluded that in order to protect the continued viability of the slow-growth forests found within the park and preserve, limited harvesting of green logs could continue under certain conditions and would need to be closely monitored. In addition, the number of requests for green log permits has steadily increased since the establishment of the park. In order to deal with these requests in a rational and reasonable manner, the following policy and permits terms and conditions have been established:

POLICY

It is the policy of the Superintendent, Wrangell-St. Elias National Park and Preserve, to allow for the non-commercial cutting of green logs in accordance with the provisions of the Alaska National

Interest Lands Conservation Act (ANILCA) and Title 36 CFR, Part 13.49, "... the Superintendent may permit cutting in accordance with the specifications of a permit if such cutting is determined to be compatible with the purposes for which the park area was established". This policy covers the non-commercial cutting of live standing timber (green logs) for appropriate subsistence uses, such as houselogs or firewood greater than 3" at ground height.

Of primary concern to the National Park Service is the maintenance and protection of forest resources and other park values. Subsistence green log permits will only be issued if it can be shown that harvest will not impair or otherwise degrade the viability of the forest resource and other park values.

Applicants for subsistence green log permits must meet the following conditions prior to issuance of a permit by the Park Superintendent.

STANDARD PERMIT PROCEDURES AND CONDITIONS:

For subsistence house log permits, the applicant must demonstrate a significant need for green logs, and may only be used for a primary place of residence.

Applicant, generally, must live within the park boundary and have demonstrated a customary and traditional use of park resources.

Applicant must provide evidence of exploring reasonable alternative sources for logs such as logs from state, private or university lands, or by transporting logs which are harvested outside the park, to the building site. The Superintendent will also consider the availability of suitable downed timber from both private and public lands in determining amount of green logs to be taken from park lands.

For subsistence house log permits, the applicant must submit a rough plan/sketch, dimensions and proposed method of construction to the Superintendent before permit is considered.

For subsistence house log permits, the allowable harvest shall not exceed 120 trees (includes both live and dead trees), the amount required for a cabin of 280 sq. ft. (determined on the basis of the average size of 237 cabins identified on park/preserve lands). This amount includes a 20% allowance for waste, unusable wood, tree size variability and miscellaneous needs.

For firewood permits, the applicant will be limited to what is reasonably needed for purposes of heating, cooking, etc. in the primary place of residence.

The Superintendent may further limit the amount of logs based on concerns for forest viability, limited annual production and potential impact on park values.

Subsistence house logs may only be used for a primary residence and may not be used for commercial purposes (sale of whole logs or sale of lumber cut from subsistence logs) or in structures used for commercial purposes (lodges, etc.).

Green logs granted for firewood use may be used only for that purpose and may not be used for house construction, saw timber or other uses unless specifically authorized on the permit.

All subsistence logs, must be marked and measured by NPS staff prior to harvest.

The Superintendent will designate access routes to be used for harvesting and skidding subsistence green logs.

Subsistence green logs may not be harvested farther than one half mile from a designated access route.

Timber felling and skidding will be limited by ground conditions and season to protect resource values and is generally limited to frozen ground with a minimum of 6-12" of snow cover.

An additional subsistence house log permit will not be issued to a landowner/family for a period of 10 years after the previous permit was issued. This condition applies to any land subdivided or transferred subsequent to the issuance of the original subsistence house log permit.

An additional subsistence house log permit may be issued due to emergency or unusual and unforeseen circumstances (fire, other damage, etc.).

Subsistence firewood permits may be issued on a yearly basis.

Permits may not be issued in zones or areas where subsistence timber harvest would result in a threat to the viability of the forest resource or which would otherwise compromise the purposes for which the park was established.

Environmental, archeological, historical and subsistence compliance may be required prior to issuance of subsistence log permit.

The Special Use Permit (10-114) shall be the permitting instrument and shall be completed in accordance with NPS-53.

Violation of the terms and conditions of the permit may result in an immediate revocation of the permit by the Superintendent.

Subsistence green log permits may only be issued by the Superintendent or his designee.

This policy will remain in effect until revoked in writing by the Superintendent.

A handwritten signature in cursive script, reading "Richard H. Martin". The signature is written in dark ink and is positioned above the printed name.

Richard H. Martin